

Off-Road Implementation Advisory Group (ORIAG) Meeting



March 29, 2010
Sacramento, CA

California Environmental Protection Agency
Air Resources Board



This meeting is being webcast
and recorded.

ORIAG members may email
mbaker@arb.ca.gov during this meeting
for comments and questions.

There is a Public Comment period near
the end of this meeting.

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Agenda

- 9:30 – 11:00
 - ARB Staff Presentation
- 11:00 – 12:00
 - ORIAG member suggestions for regulation changes
- 12:00 – 12:45
 - Lunch
- 12:45 – 1:30
 - Continue discussion on ORIAG member suggestions for regulation changes
- 1:30 – 2:00 (or as early as 12:45)
 - DOORS Updates
- 2:00 – 2:30
 - Public Comment Period (or as early as 1:15, depending on previous items)
- 2:30 – 2:45 (or as early as 1:45)
 - Wrapup/adjourn

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ARB Staff Presentation Outline

- Enforcement Delay
- March 11 EO hearing and Future Changes
- Retrofit Visibility
- Reporting Update
- Status of Regulation Amendments Completed and In Progress

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Enforcement Delay



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AGC Petition

- Petition
 - Filed on January 11, 2010
 - Requested ARB:
 - Delay fleet average targets for 2 years
 - Withdraw request for authorization from U.S. EPA
- ARB Response
 - Enforcement delay
 - March 11 Executive Officer hearing

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Enforcement for Performance Requirements Delayed

- No enforcement for noncompliance with emission performance provisions of the regulation until further notice :
 - March 1, 2010 large fleet requirements for vehicle retrofit and replacement
 - Limitations on adding higher emitting Tier 0 and Tier 1 vehicles
 - Requirements for new fleets to meet fleet average targets
- Fleets will not be retroactively cited for non-compliance during the enforcement delay.
- Enforcement advisory
<http://www.arb.ca.gov/enf/advs/advs414.pdf>

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Some Requirements Still Being Enforced

- Portions of the regulation are enforceable
 - Reporting and Labeling
 - Idling Restriction and Idling Policy
 - Disclosure with Vehicle Sales
- Currently enforcement division is pursuing ten enforcement cases for not reporting

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March 11 EO Hearing and Future Changes



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Summary of March 11, 2010, Executive Officer Hearing

- Industry provided information
 - Economic growth forecast
 - Recession's impact on fleets
 - Inventory estimate
- Many fleets requested 2 to 5 year delay
 - Other potential changes identified

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Future Changes

- Evaluate SIP status
 - Truck and bus regulation
 - Off-road regulation
- Use “cushion” to provide additional relief in both rules
- Maintain health benefits
- Meet SIP needs

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Timeline for Future Changes

- April 22, 2010 Report to Board
 - Summary of the March 11 hearing
 - Effect of the recession on emissions
 - Progress toward meeting the SIP
 - Summary of potential revisions to both rules
- May/June 2010:
 - Workshops on revised emission inventories and proposed amendments
- July 2010: Staff proposal released
- Aug 2010 Special Board Hearing
 - Revisions to both the truck and bus and off-road reg

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Retrofit Visibility



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Interim Visibility Policy

- The regulation exempts vehicles from retrofitting where a retrofit would be unsafe
- CalOSHA is developing a standard for retrofit visibility (late 2010 or 2011)
- To prevent installs now that would later violate CalOSHA standards, ARB will exempt vehicles that cannot be retrofit without impacting visibility
- See Interim Visibility Policy at <http://www.arb.ca.gov/msprog/ordiesel/documents/interim%20vis%20policy.pdf>

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2010 Retrofit Requirements

- Retrofit requirements not currently being enforced
- If retrofitting now, select vehicles to retrofit where the retrofit does not block operator visibility
- If no vehicles in the fleet can be retrofit without blocking operator visibility, the fleet is exempt from retrofit requirements for 2010

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Operator Visibility

- Visibility defined by an operator of average height and weight, looking in any direction around a vehicle
- Retrofit installation should not block their view of surroundings in any direction

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Installations that Create Masking



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Installations that Create Masking 2



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Installations without Masking



<http://www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm> 19

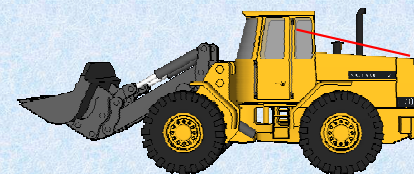
Installations without Masking 2



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Determining Visibility

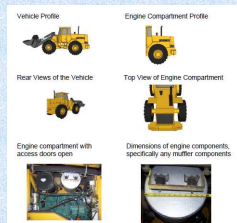
- For cases that are unclear, use the guide at www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm



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Claiming an Exemption

- Follow exemption guide and application
- Submit paperwork to ARB



<http://www.arb.ca.gov/msprog/ordiesel/vdecssafety.htm>

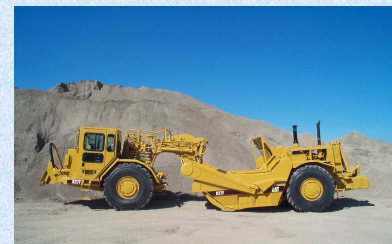
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Safety Exemption Application

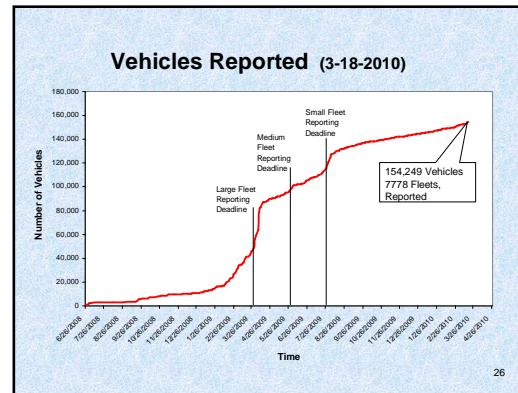
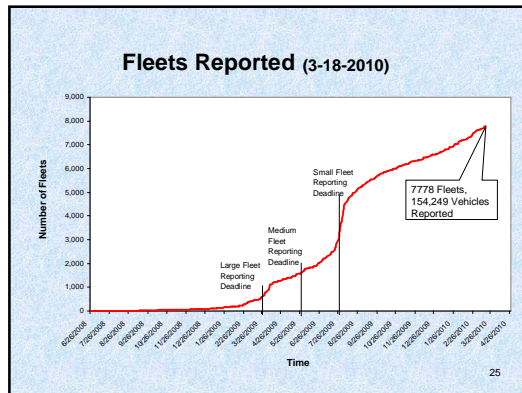
- Original process proposed at Nov. 2009 ORIAG meeting:
 - Fleet hire Professional Engineer to assess multiple locations for retrofit
 - If no retrofit possible without impairing visibility, complete exemption form and submit to ARB
- Revised streamlined process:
 - Fleet completes application form with vehicle info. No need to hire PE.
 - ARB posts on-line
 - Retrofit manufacturers/installers respond within 30 days
 - <http://www.arb.ca.gov/msprog/ordiesel/vdecexempt.htm>

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Reporting Update



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- ### Regulation Amendments: January 2009
- Extend double credit for early PM retrofits to January 1, 2010
 - Simplification of changing fleet size requirements
 - Other minor clarifications
 - No 15-day modifications
 - Now in effect
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- ### Regulation Amendments: July 2009 AB 8 2X
- New reduced activity and reduced horsepower credits
 - Changes in BACT schedule
 - No Administrative Procedure Act (APA) requirements
 - Now in effect
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- ### Regulation Amendments: July 2009 Other Amendments
- Early retrofits:
 1. Double credit towards NOx requirements for NOx retrofits
 2. Extend double credit for PM retrofits in medium/small fleets to March 1, 2012
 3. Lifetime turnover exemption for early retrofit
 - Limited to 15% of a fleet's total horsepower
 - Early repowers:
 - Turnover credit for repowers done before turnover required
- 30

Regulation Amendments: July 2009 Other Amendments Cont'd

- 15 day modifications
 - VDECS That Impairs Safe Operation of Vehicle
 - Change "impossible" to "technologically infeasible"
 - Clarify 2013 BACT requirements
 - Fleets not subject to retrofit or turnover requirements in 2012 not required to meet the 36 % retrofit rate or 14.4 % turnover rate in 2013
 - Still do 20% retrofit, 8% turnover
 - Order of Turnover
 - Fleets can get credit for installing NOx VDECS before all Tier 0 and dirtiest Tier 1 engines are turned over

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ORIAG Member Discussion

DOORS / Reporting Updates



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Recent DOORS Updates

- 2010 Compliance Page
- Reporting AB 8 2X Reduced Activity and Reduced Horsepower Credits
- Hour Entry (Low Use, Fleet Averages)
- Aggregating Sub-fleets

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2010 Compliance Summary

Fleet is not 2010 Compliant			
Fleet must: Turnover 5,978 Hp or meet the NOx fleet average. May be met with early credit on vehicle turnover.			
Fleet Size: First Compliance Date: Requirements:		Large March 1, 2010 NOx and PM	
2010 NOx Requirements: Not Met NOx Fleet Average: Not Met Required BACT Turnover: 10,474 Hp (8% of Fleet Horsepower) Current Turnover Credit: 4,496 Hp	2010 PM Requirements: Not Met PM Fleet Average: Not Met Required BACT Requirements: 26,186 Hp (20% of Fleet Horsepower) Current Retrofit Credit: 42,972 Hp		
Turnover Requirements: 5,978 Hp If you meet the fleet average before accruing this turnover, you have met the 2010 requirements. For more information on accumulating turnover credit see the 2010 guide to compliance or the early credit guide .	Carryover PM Credit: 16,786 Hp Carryover credit is applied to 2011 requirements. Unused Reduced Activity Credit expires if not used in 2010 or 2011.		

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Credit Summary

- Example of portion of a report for one fleet
- Credit in horsepower units

Nox Credit	
2006-2010 Retirement:	391
Reduced Activity:	6,401
Early Replacement:	0
Repowers	4,931
2009-2010 Turnover:	0
Total:	11,724

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AB 8 2X: Reduced Horsepower

Include all vehicles the fleet owned since March 1, 2006, in the fleet report in DOORS

Line #	EIN	Veh serial num	Your veh num	Type	Manufacturer						
10				Bore/Drill Rigs	ABL						
<div>Enter Data</div>											
Edit	Delete	Sell/Retire	Line #	EIN	Veh serial num	Type	Veh Manufacturer	Veh Model	Veh MY	Purch	
Edit	Delete	Sell/Retire	0	MM/A67	24udh89479uh	20046	Bore/Drill Rigs	ABL	22423423	2006	1988-4
Edit	Delete	Sell/Retire	0	HL5B79	345345345cg	4045	Skid Steer Loaders	ABL	20014001	2003	1999-4
Edit	Delete	Sell/Retire	7	MMH25	7808900000	4045	Skid Steer Loaders	ABL	20014001	2003	1999-437

AB 8 2X: Reduced Activity

Three Steps

1. Online in DOORS
2. Complete ARB forms
3. Mail in ARB form with fleet records

<http://www.arb.ca.gov/msprog/ordiesel/activity.htm>

Reporting Reduced Activity: Online

Hours of operation:

Model	MY	2007 Hours	2010 Hours
350G	2002	476	351
456	2009	176	158
140G	1981	190	205

Reporting Reduced Activity Forms

Complete ARB form, and include fleet records (paper and/or electronic)



<http://www.arb.ca.gov/msprog/ordiesel/activity.htm>

Reduced Activity: Reporting

What Records Are Required?

- Hour meter logs, vehicle tracking software
- Payroll records, tax records for employees
- Fuel receipts, tax records for fuel
- Revenue from tax receipts
- Shipping records for goods / services
- Production / services records

Reporting Low Use

Not Low Use	Year to Year	Year to Year Outside	Designated	Designated Outside	EIN
<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	AN8D66
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	gN4G66
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<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	HL5B79

Moving Forward

- DOORS updates in the future will depend largely on any changes to the regulation.
- Other thoughts, questions, ideas?

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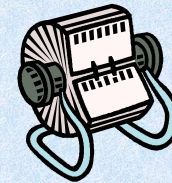
Public Comment Period

Email for sending comments:
mbaker@arb.ca.gov



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ARB Website and Contacts



California Environmental Protection Agency
Air Resources Board



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Off-Road Contacts

Knowledge Center - <http://www.arb.ca.gov/msprog/ordiesel/knowncenter.htm>
Off-Road Regulation - www.arb.ca.gov/msprog/ordiesel
Diesel Help Line: 1-866-6DIESEL (1-866-634-3735)
DOORS Help Line: 1-877-59DOORS (1-877-593-6677)

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Meeting Wrap Up and Adjourn



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